EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC., PRODUCTS LIABILITY LITIGATION))))) MDL NO.: 1:13-md-2419-FDS
THIS DOCUMENT RELATES TO: ALL ACTIONS)	

DECLARATION OF ROMMEL MAPA

- I, Rommel Mapa, declare under penalty of perjury that the following is true and correct to the best of my knowledge, pursuant to 28 U.S.C. § 1746:
- 1. I am employed by Donlin, Recano & Company, Inc. ("<u>DRC</u>"), 419 Park Avenue South, Suite 1206, New York, NY 10016.
- 2. DRC serves as claims agent for Paul D. Moore, in his capacity as Chapter 11 Trustee of New England Compounding Pharmacy, Inc., d/b/a New England Compounding Center ("NECC").
- 3. Pursuant to that certain *Order (I) Establishing Deadline for Submitting Proofs of Claim,*(II) Approving Certain Additional Requirements and Procedures for Personal Injury Tort and Wrongful
 Death Claims and (III) Approving Form and Manner of Notice Thereof [Bankr. Doc. No. 582] (the "Bar
 Date Order") entered by the United States Bankruptcy Court for the District of Massachusetts on
 September 27, 2013, DRC was designated as the recipient for all proofs of claim in the NECC chapter 11

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case.

4. I have reviewed the claims received by DRC on or before the applicable claims

bar date (January 15, 2014 at 4:00 p.m. prevailing Eastern Time) and have determined that each

of the so-called Gentry Locke Plaintiffs, Frith & Ellerman Plaintiffs, and LichtensteinFishwick

and Brown & Jennings Intervenors (collectively, the "Objectors") has submitted a proof of claim

in the NECC chapter 11 case.

5. Attached hereto as Exhibit 1 is a chart setting forth the name of each individual

Objector who filed a proof of claim, the claim amount alleged in such proof of claim, the date on

which each Objector filed its proof of claim, and the number assigned to each proof of claim.

I declare under penalty of perjury that the foregoing is true and correct to the best of my

knowledge.

Dated: January 27, 2014

/s/ Rommel Mapa

Rommel Mapa